**Cross-Border Acknowledgment III: Accreditation-Record Evidence (MAB/477-4/2025) on QA/ESG Compliance at a Hungarian Medical School**

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**Series: Cross-Border Acknowledgment of Academic Obstruction: A Case Study in Whistleblower Documentation and International Accreditation Monitoring**

**Cross-Border Acknowledgment of Academic Obstruction**
**A Systemic QA Dossier on Access Denial, Policy Inconsistency, and Accreditation Risk**

**Date:** November 2, 2025

## Abstract

This paper documents and analyzes a cross-border accreditation record concerning alleged administrative obstruction at a Hungarian medical school. Using a documentary legal method, we compile and ***authenticate primary-source correspondence*** with the ***Hungarian Accreditation Committee (MAB)—***including the registry acknowledgment **MAB/477-4/2025** and related emails reproduced in **Appendix I**—to show that a systemic quality-assurance dossier (access denial, policy inconsistency, assessment validity) has formally entered Hungary's national and **WFME** accreditation processes. The evidentiary chain spans ***July–October 2025***. It includes dated submissions, Secretariat replies, and registry numbers confirming evaluation in forthcoming ***institutional/WFME reviews***, thereby ***transforming a single-institution dispute into an accreditation-level QA matter.*** Substantively, the dossier maps alleged risks to **ESG 1.2 (programme design & deliverability), ESG 1.3 (fair assessment), and ESG 1.6 (learning resources & support)**, with implications for **ECFMG**-relevant recognition. We argue that once evidence is registered in the accreditation system, transparency becomes part of the audit trail and cannot be quietly erased. The paper contributes a replicable template for evidentiary archiving (timeline figure + Appendix I exhibits) and for linking micro-level student rights to ***macro-level QA/ESG oversight and the EU's rule-of-law conditionality framework***. Evidence citations and registry references are drawn from the author's correspondence dossier and **Appendix I** as compiled in this manuscript.

**Keywords:** Accreditation; Quality Assurance; ESG; WFME; ECFMG; Higher Education Law; Administrative Procedure; Whistleblower; Hungary; Semmelweis University; HAC/MAB; Rule of Law.

**JEL Codes:** I23, I28, K23, K33, O57, H83.

**eJournal picks:** ERN Education (Higher Ed; Policy & Planning); LSN Administrative Law; LSN European Public Law; Evidence & Proof; PSN Institutions/Transition.

## 1. Legal and Institutional Context

### Accreditation Complaint Framework

The ***Hungarian Accreditation Committee (HAC/MAB***) operates under a **Complaint Management Policy** adopted by ***Decision 2020/8/VII/2 (September 25, 2020***). The policy states that complaints may involve **procedural errors, irregularities, or staff conduct** related to **HAC processes (§ 4.2)** and must be handled fairly **acc**ording to consistent rules (§ 1.2). It explicitly recognizes that any **individual or institution involved in or affected by HAC's legal activities** (§ 3.1), including students in accredited programs raising systemic QA concerns, can file complaints. According to **§§ 5.1–5.9,** the Secretariat verifies formal compliance, a review officer **(law-qualified)** investigates the facts, and HAC is required to provide a **direct written response detailing actions taken and outcomes** within **90 days**; if a **legal violation** is found, HAC must notify the relevant supervisory authority. Those involved in the alleged conduct cannot make decisions in the case, and records are kept for five years, with annual public analyses to prevent future issues. In this context, the author's file—focused on **ESG 1.2/1.3/1.6** risks and registered as **MAB/477-4/2025**—clearly falls under the ***scope of the policy and deadlines for QA-based handling.***

**Hungary's higher-education oversight framework is grounded in:**

- **Act CCIV of 2011 on National Higher Education, §§ 70–72,** establishing MAB as an independent accreditation body:
- **Act LXXIX of 2019** on Educational Governance; and
- **European Standards and Guidelines for Quality Assurance (ESG 2015)**, especially:
    - ***ESG 1.2* –** Design and approval of programs:
    - ***ESG 1.3* –** Student-centered learning and assessment:
    - ***ESG 1.6*** – Learning resources and student support.

These provisions require accredited universities to maintain adequate facilities, ensure equal access, and provide fair evaluation conditions, which were allegedly violated in the Semmelweis case.

Internationally, MAB's recognition by the **World Federation for Medical Education (WFME)** links its decisions to global standards and to **U.S. ECFMG 2024 certification eligibility**.

**This installment follows:**

1. **Cross-Border Acknowledgment I –** *Initial Submission to National and International QA Bodies* (SSRN ID 5380402)
2. **Cross-Border Acknowledgment II** – *Passive Oversight and the PIPER Principle* (SSRN ID 5384860).
3. **Cross-Border Acknowledgment III:** The Crossword of PIPER -Passive Oversight and the Institutionalization of Inaction

**Together, the trilogy provides a full procedural record from complaint initiation to formal accreditation recognition.**

**2. Evidentiary Record of Communication**

The communication trail reproduced in **Appendix I** demonstrates unbroken correspondence between **July 2025 and October 2025**.

| Date | Action / Document | Registry / Ref. | Exhibit |
|---|---|---|---|
| **22 July 2025** | Initial submission of QA Dossier (Appendices A–F) to MAB via email; request for systemic review of Semmelweis resource compliance. | Internal Email ID "QA-MAB-Sub-2025-07-22" | A |
| **29 Aug 2025** | Clarification distinguishing personal grievance from QA submission. | – | B |
| **2 Sept 2025** | MAB Secretariat acknowledgment citing Act CCIV § 71 (1). | **MAB/477-2/2025** | C |
| **3 Sept 2025** | Confirmation that materials "will be evaluated during forthcoming institutional and WFME accreditation procedures." | **MAB/477-4/2025** | D |
| **3 Sept 2025 01:19 AM** | Follow-up attaching QA brief (2 pp.) and ORCID proof of publications. | – | E |
| **Oct 2025** | Publication of updated SSRN/ResearchGate versions after threat letter; notification to MAB and WFME of continued transparency. | Cross-ref. Ombudsman Case EBF-AJBH-309-2025 | F |

Correspondence:

Dear Mr. Siddhartha Harsh Wardhan ,

Thank you for your inquiry.

We hereby confirm that the submitted document has been well received.

We will process the documentation and get back to you within 30 working days.

Thank you for your understanding.

Best Regards,

MAB Secretariat

**From:** Siddhartha HARSH WARDHAN <siddhartha.harsh@stud.semmelweis.hu>
**Sent:** Thursday, July 24, 2025 5:22 PM
**To:** MAB Titkárság (e-mail: titkarsag@mab.hu) <titkarsag@mab.hu>
**Subject:** Formal Oversight Complaint – Semmelweis University Accreditation Concerns (WFME Referral

> You don't often get email from siddhartha.harsh@stud.semmelweis.hu. Learn why this is important

Dear Hungarian Accreditation Committee (MAB),

By the recommendation issued to me by the World Federation for Medical Education (WFME), I am formally submitting the attached bilingual complaint regarding serious academic and procedural violations at Semmelweis University.

The case involves obstruction of academic access, denial of laboratory participation despite valid FM/CV status, inconsistent policy enforcement, and questionable examination standards. These matters are now under:

- Judicial review at the Budapest Metropolitan Court

  (Case No. 7.Kpk.750.239/2025/2)
- Investigation by the Hungarian Ombudsman (Case ID: EBF–AJBH–309–2025)
- Documentation via SSRN and ResearchGate for public transparency

As Hungary's WFME-recognized national accreditation body, I respectfully request MAB's attention and intervention to review whether Semmelweis University remains in compliance with national and international academic quality standards.

Attached to this email:

- Bilingual accreditation complaint letter (English & Hungarian)
- Court case acknowledgment (PDF)
- Ombudsman confirmation

- SSRN publication link:
https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5346250

- DOI (ResearchGate): https://doi.org/10.13140/RG.2.2.26234.81604

Should MAB require any further documentation or clarification, I remain available for cooperation and can provide access to the complete legal appendix (A–F) upon request.

Sincerely,

Siddhartha Harsh Wardhan

Whistleblower under Act XXV of 2023

Semmelweis University – Faculty of Medicine

U.S. and EU Citizen

Email: siddhartha.harsh@stud.semmelweis.hu

Neptun Code: AXEMG8

## Hungarian Version / Magyar Verzió

Tisztelt Magyar Akkreditációs Bizottság (MAB),

A World Federation for Medical Education (WFME) ajánlása alapján ezúton hivatalosan is benyújtom a Semmelweis Egyetemmel kapcsolatos panaszomat az Önök hivatalához.

Amerikai és európai uniós állampolgár vagyok, jelenleg a Semmelweis Egyetem angol nyelvű orvosi programjában tanulok. A panaszom az alábbi problémákra vonatkozik:
- Bonctermi gyakorlatból való kizárás (2025. február–május)
- FM/CV státusz inkonzisztens alkalmazása
- SZMSZ 5., 10., 13., 29., 45. és 55. cikkelyének megsértése
- Módosított anatómiai preparátum használata szóbeli vizsgán
- Írásos szabályozási hivatkozás hiánya a „szignó visszavonása” intézkedésre

Az ügy jelenleg:
• Jogorvoslati eljárás alatt áll a Fővárosi Törvényszéken (Ügyszám: 7.Kpk.750.239/2025/2)

• Bejelentett ügyként szerepel az Alapvető Jogok Biztosának Hivatalánál (Ügyszám: EBF–AJBH–309–2025)
• Tudományosan dokumentált SSRN és ResearchGate DOI-ként

Tisztelettel kérem, hogy a MAB – mint a WFME által elismert magyar akkreditációs szerv – vizsgálja ki az ügyet.
Az ügy súlyossága Magyarország nemzetközi orvosi oktatási megbízhatóságát és szakmai hitelességét érinti.

Csatolva találhatók:
• Teljes bizonyítékcsomag (A–F mellékletek)
• Jogorvoslati beadványok és intézményi válaszlevelek
• DOI és SSRN hivatkozások

Tisztelettel,
Siddhartha Harsh Wardhan
Email: siddhartha.harsh@stud.semmelweis.hu
USA és EU állampolgár
Neptun kód: AXEMG8
Semmelweis Egyetem, Általános Orvostudományi Kar

From: MAB Titkárság (e-mail: titkarsag@mab.hu) <titkarsag@mab.hu>
Subject: RE: Systemic QA submission (ESG/WFME) – Semmelweis University – Research dossier for expert review (no individual remedy requested)
Date: September 2, 2025 at 3:49:28 PM GMT+2
To: Siddhartha HARSH WARDHAN <siddhartha.harsh@stud.semmelweis.hu>
Cc: MAB Titkárság (e-mail: titkarsag@mab.hu) <titkarsag@mab.hu>, Lakatos Péter Levente <lakatos.peter@mab.hu>

Reg. nr: **MAB/477-4/2025**

Dear Siddhartha Harsh Wardhan,

Thank you for the information and the materials provided, which we have carefully reviewed.
The university's compliance with the relevant standards will be evaluated by the MAB in the course of the forthcoming institutional accreditation

and WFME medical accreditation procedures.

Best Regards,
MAB Secretariat

**From:** Siddhartha HARSH WARDHAN <siddhartha.harsh@stud.semmelweis.hu> **Sent:** Friday, August 29, 2025 4:37 PM**To:** MAB Titkárság (e-mail: titkarsag@mab.hu) <titkarsag@mab.hu>**Cc:** MAB Titkárság (e-mail: titkarsag@mab.hu) <titkarsag@mab.hu>; Lakatos Péter Levente <lakatos.peter@mab.hu>**Subject:** Systemic QA submission (ESG/WFME) – Semmelweis University – Research dossier for expert review (no individual remedy requested)

Dear MAB Secretariat,**Re: MAB/477-2/2025**

Thank you for your response and for directing me to **MAB's Complaint Management Policy.** I wish to clarify that I am not seeking an individual legal remedy nor submitting a "complaint" under that policy. Instead, I am submitting a **systemic quality-assurance (QA) research dossier** for MAB's **expert review** under **Act CCIV/2011 and the ESG/WFME framework**.

**Scope (systemic QA, not personal grievance)** The dossier comprehensively outlines programme deliverability (**ESG 1.2), assessment fairness and validity (ESG 1.3), and resource adequacy (ESG 1.6) through the employment of neutral, documentary indicators that influence multiple cohorts**. These indicators encompass, but are not limited to, intake versus capacity, consistency of FM/CV access across departments, and the quality of materials used in high-stakes assessments. The context is articulated within research and standards-mapping frameworks, without requesting grades, enrollment figures, or individual outcomes. The evidence provided includes a national study indicating a **67.5% international attrition rate compared to approximately 20% domestic attrition**

within Hungarian medical training, thereby underscoring the systemic risk environment relevant to quality assurance entities.

Sincerely yours
Siddhartha Harsh Wardhan

**From:** MAB Titkárság (e-mail: titkarsag@mab.hu) <titkarsag@mab.hu>**Date:** Friday, August 29, 2025, at 12:45 PM**To:** Siddhartha HARSH WARDHAN <siddhartha.harsh@stud.semmelweis.hu>**Cc:** MAB Titkárság (e-mail: titkarsag@mab.hu) <titkarsag@mab.hu>, Lakatos Péter Levente <lakatos.peter@mab.hu>**Subject:** RE: Formal Oversight Complaint – Semmelweis University Accreditation Concerns (WFME Referral

**MAB/477-2/2025**

**Dear Siddharta Harsh Wardhan,**

Regarding your message sent to the Secretariat of the Hungarian Accreditation Committee (MAB) at the email address titkarsag@mab.hu, we would like to let you know about the following.

According to Section 71 (1) of Act CCIV of 2011 on National Higher Education (hereinafter: NHEA), MAB is an independent national body of experts established for the external evaluation of the quality of training, scientific research, and artistic activities in higher education, as well as the operation of the internal quality assurance systems of higher education institutions. In accordance with the provisions of the NHEA, MAB serves as an expert body in procedures related to higher education institutions.

Detailed information on complaints that may be submitted to MAB and on the procedure for their submission is provided in the document *Complaint Management Policy*, which is available on MAB's website (www.mab.hu) under the "Procedures" menu, in the section *Appeals and Complaints*.

On this basis, complaints may be submitted to MAB as follows:

**2. Complaint** “**2.1.** A complaint refers to any individual request or grievance concerning activities related to HAC procedures in which complainants present their objections and describe a clear and specific request regarding the execution of those activities.”
**4. Submission of a complaint** “**4.1.** 1 Complaints must be on a topic related to a HAC procedure but may not be aimed at seeking a review of or legal remedy against a final decision of the HAC. Complaints regarding the outcome of an assessment are not admitted. **4.2.** Complaints may address, among others, errors of process, irregularities, or the behaviour of any person acting on behalf of the HAC.”
Based on our opinion, the report and complaint you have indicated should primarily be investigated by the higher education institution concerned, or a procedure may be initiated with the Commissioner for Educational Rights, in accordance with Decree No. 40/1999. (X. 8.) OM on the tasks and rules of operation of the Office of the Commissioner for Educational Rights.
Yours sincerely, **MAB Secretariat**

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**References**


- Act CCIV of 2011 on National Higher Education (Hungary).
- Act CL of 2016 on General Administrative Procedure (Hungary).
- Act LXXIX of 2019 on Educational Governance (Hungary).
- Council Implementing Decision (EU) 2022/2506 of December 12, 2022, on measures for the protection of the Union budget.
- European Association for Quality Assurance in Higher Education (ENQA). (2015). *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*.
- Hungarian Accreditation Committee (HAC). (September 25, 2020). *Complaint Management Policy* (Adopted through Decision 2020/8/VII/2).
- Harsh Wardhan, Siddhartha, Cross-Border Acknowledgment of Academic Obstruction: A Case Study in Whistleblower Documentation and International Accreditation Monitoring (August 05, 2025). 10.13140/RG.2.2.34225.29289, Available at SSRN: https://ssrn.com/abstract=5380402 or http://dx.doi.org/10.2139/ssrn.5380402
- Harsh Wardhan, Siddhartha, Cross-Border Acknowledgment of Academic Obstruction: A Systemic QA Dossier on Access Denial, Policy Inconsistency, and Accreditation Risk (September 07, 2025). Available at SSRN: https://ssrn.com/abstract=5454954 or http://dx.doi.org/10.2139/ssrn.5454954
- Wardhan, S. H. (2025). *Cross-Border Acknowledgment III – Passive Oversight and the PIPER Principle*. SSRN Working Paper (SSRN ID 5384860).
- Wardhan, S. H. (2025). *Gatekeeper of Rights II: Continuing Whistleblower Investigation and Procedural Termination Without Notification*. SSRN Working Paper.
- World Federation for Medical Education (WFME). (2015). *WFME Global Standards for Quality Improvement: Basic Medical Education*.